

BRUCE D. GOLDSTEIN, State Bar No. 135970
 County Counsel
 ANNE L. KECK, State Bar No. 136315
 Deputy County Counsel
 County of Sonoma
 575 Administration Drive, Room 105A
 Santa Rosa, California 95403-2815
 Telephone: (707) 565-2421
 Facsimile: (707) 565-2624
 E-mail: akeck@sonoma-county.org

Attorneys for Defendants the County
 of Sonoma, Former Sheriff-Coroner William
 Cogbill, and County employees Michael
 Shanahan, Caroline Japp, Jo Weber,
 Nicholas Honey, Jerry Allen, Betty
 Johnson, and Robin Smith

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

SALLY STEINHART,
 Plaintiff,

v.

COUNTY OF SONOMA, et al.,
 Defendants.

No. CV-10-00841 RS

**STIPULATION FOR ORDERS TO: (1)
 EXTEND TIME FOR FILING A THIRD
 AMENDED COMPLAINT; (2) EXTEND
 TIME TO RESPOND TO COMPLAINT
 AND FILE ANTI-SLAPP MOTION;
 [PROPOSED] ORDER**

This joint stipulation is entered into by and between Plaintiff in pro per, Sally Steinhart ("Plaintiff"), and Defendants the County of Sonoma, former Sheriff-Coroner William Cogbill, and County employees Michael Shanahan, Caroline Jaap, Jo Weber, Nicholas Honey, Jerry Allen, Betty Johnson and Robin Smith (collectively, "County Defendants"). Through this stipulation, these parties request that the Court further extend the time for Plaintiff to file a Third Amended Complaint ("TAC") through May 20, 2011, and to concomitantly extend the time for County Defendants to file a response to the TAC and to file an Anti-SLAPP Motion under California Code of Civil Procedure Section 425.16 through June 28, 2011. Defendant the State Department of Social Services and other named defendants have not appeared in this action, and are not parties to this stipulation.

RECITALS

A. Plaintiff initiated this action on February 26, 2010, and filed her First Amended Complaint on June 21, 2010 (Dkt. No. 8). County Defendants responded by filing their Motion to Dismiss the First Amended Complaint and Motion for More Definite Statement on July 26, 2010 (Dkt. No. 12) (hereinafter, the “Motions”). The Court resolved the County Defendants’ Motions on February 7, 2011, through its “Order Granting in Part and Denying in Part Motion to Dismiss and Denying Motion for a More Definite Statement” (Dkt. No. 34) (hereinafter, the “2/7/11 Order”). Thereafter, Plaintiff timely filed her Second Amended Complaint on March 9, 2011 (Dkt. No. 38).

B. On April 4, 2011, this Court approved a stipulation of the parties and entered an order: (1) permitting Plaintiff to file a TAC through April 29, 2011; (2) providing County Defendants through May 31, 2011, to file a respond to the TAC and an Anti-SLAPP motion under California Code of Civil Procedure Section 425.16; and (3) continuing the Case Management Conference to July 14, 2011, at 10:00 a.m. (Docket No. 41.)

C. Plaintiff has requested additional time in which to prepare and file her TAC through May 20, 2011, and County Defendants agree to such request. In return, Plaintiff has agreed to extend the time in which County Defendants may file a response to the TAC, and an Anti-SLAPP Motion under California Code of Civil Procedure Section 425.16, through June 28, 2011.¹ The parties have agreed to retain the current Case Management Conference date of July 14, 2011.

D. The parties believe that such additional time is warranted to provide Plaintiff with the opportunity to further research and investigate the claims in her complaint, to conform the TAC to the Court’s 2/7/11 Order, and to provide County Defendants with sufficient time in which to respond.

WHEREFORE, the parties to this stipulation hereby agree and request entry of a court order as follows:

¹This Court has the discretion under California Code of Civil Procedure Section 425.16(f) to extend the initial 60-day filing period for Anti-SLAPP motions to “any later time upon terms it deems proper.”

STIPULATION

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2 1. The parties request that the time in which Plaintiff may file a third amended
3 complaint in this case be extended through and including May 20, 2011.

4 2. The parties request that time in which County Defendants may file a response to the
5 current Second Amended Complaint or any third amended complaint (if filed) be extended through
6 and including June 28, 2011.

7 3. The parties request that the time in which County Defendants may file their Anti-
8 SLAPP motion under California Code of Civil Procedure Section 425.16 as to certain State Law
9 claims alleged herein be extended through and including June 28, 2011.

10 4. This stipulation does not prevent or preclude the parties from seeking additional relief
11 from this Court, to amend this stipulation and order or otherwise.

12 Respectfully submitted,

13 Dated: April 29, 2011

Bruce D. Goldstein, County Counsel

14 By: /s/ Anne L. Keck
15 Anne L. Keck, Deputy County Counsel
16 Attorneys for County Defendants

17 Dated: April 29, 2011

Sally Steinhart, Plaintiff in pro per

18 By: /s/ Sally Steinhart
19 Sally Steinhart
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[PROPOSED] ORDER

Pursuant to and in accordance with the foregoing Stipulation, and with good cause appearing, it is hereby ordered as follows:

1. The time in which Plaintiff may file a third amended complaint in this case is extended through and including May 20, 2011.

2. The time in which County Defendants may file a response to the current Second Amended Complaint or any third amended complaint (if filed) is extended through and including June 28, 2011.

3. The time in which County Defendants may file their Anti-SLAPP motion under California Code of Civil Procedure Section 425.16 as to certain State Law claims alleged herein is extended through and including June 28, 2011.

IT IS SO ORDERED.

Date: 4/29/11



HONORABLE RICHARD SEEBORG
United States District Judge